

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUAN ROMAN, ON BEHALF OF HIMSELF	:	<u>ECF CASE</u>
AND ALL OTHER PERSONS SIMILARLY	:	
SITUATED,	:	
	:	Case No.: 1:21-cv-5939
	:	
<i>Plaintiffs,</i>	:	
	:	
-against-	:	
	:	
GREENWICH VILLAGE DENTAL ARTS P.C.,	:	
AND ADVANCED DENTAL ARTS, P.C.,	:	
	:	
<i>Defendant.</i>	:	

DECLARATION OF JACOB J. SCHINDELHEIM IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS PLAINTIFF'S COMPLAINT

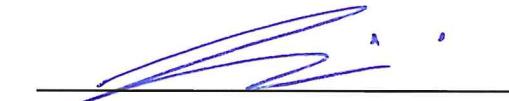
1. I am an attorney in the law firm of Koss & Schonfeld, LLP, attorneys for Defendants GREENWICH VILLAGE DENTAL ARTS P.C. and ADVANCED DENTAL ARTS, P.C. (hereinafter, the "Defendants").

2. I submit this declaration on behalf of Defendants in support of Defendants' Motion to Dismiss Plaintiff's First Amended Complaint, in the above-referenced matter.

3. Attached hereto collectively as **Exhibit A** are true and correct copies of Plaintiff's January 26, 2022 Summons in a Civil Action and Class Action First Amended Complaint, dated July 9, 2021. See Docket. No. 1.

4. Attached hereto as **Exhibit B** is a true and correct copy of an October 30, 2019 article about Plaintiff's law firm which is "well-known for bringing scores of website accessibility cases" and has "filed over 60 class actions in the Southern and Eastern Districts of New York" with "nearly identical" complaints.

Dated: New York, New York
March 4, 2022



Jacob J. Schindelheim, Esq.
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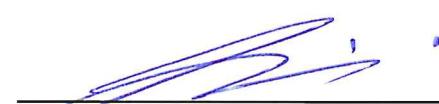
ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Jacob J. Schindelheim, Esq., an attorney admitted to practice law before the Courts of the State of New York, hereby affirms as true under the penalties of perjury that affiant is the attorney of record for the within action; that affiant has read the foregoing Motion to Dismiss and knows the contents thereof; that same is true as to affiant's own knowledge, except as to those matters therein stated to be alleged on information and belief and as to those matters, affiant believes same to be true. Affiant further states that the reason this affirmation is made by affiant and not by Defendants is that affiant's office for the practice of law is located in a different county than that of the residence of Defendants' agents.

The grounds of affiant's belief as to all matters not stated upon affiant's knowledge are as follows: statements made by Defendants and affiant's own general investigation into the facts and circumstances of this action.

Dated: New York, New York
March 4, 2022



Jacob J. Schindelheim, Esq.